SUBJECT: Questions and Answers on Implementing a Mini–Simplified Food Stamp
           Program to Replace Food Stamp Work Requirements with TANF Work
           Requirements

TO: Food Stamp Program Directors
           All Regions

Attached for immediate distribution to your respective State agencies are questions and
answers on implementing a mini–Simplified Food Stamp Program (mini–SFSP) to replace
Food Stamp Program (FSP) work requirements with those under the Temporary Assistance
for Needy Families (TANF) Program.

On June 29, 2006, the Department of Health and Human Services (DHHS) issued regulations
that define the activities that are countable toward TANF work participation rate
requirements. Since the minimum wage protections of the Fair Labor Standards Act (FLSA)
apply to TANF recipients, State agencies cannot require recipients to participate in unpaid
"work" activities, i.e., community service or work experience, at an hourly rate less than
minimum wage. However, many State agencies will not be able to offer unpaid work
activities for a sufficient number of hours to meet the TANF 20–hour core activity
requirement. The rule addresses this situation by allowing State agencies to "deem" any
family that participates for the maximum hours allowed under the minimum wage
requirements of the FLSA as having satisfied the required number of hours in core activities.
The maximum hours permissible under the FLSA must be based on both the value of the
TANF assistance unit's benefits and the household's food stamp benefits.

Although the preamble to the TANF regulation indicated that State agencies need to
implement a FSP workfare program and conform TANF and FSP exemption policies under a
mini–SFSP, we have determined that this is not necessary. By aligning FSP and TANF work
requirements in a mini–SFSP, TANF work experience or community service programs can
serve in place of the FSP workfare program.

The attached questions and answers will clarify the most important aspects of the mini–SFSP.
In addition, for State agencies that desire to pursue this alternative, we have attached a
notification letter template that simplifies mini–SFSP implementation.

If you have any questions, contact Micheal Atwell at 703–305–2449.

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Attachments